

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ESTHER LOWINGER, et al.

Plaintiffs,

v.

PZENA INVESTMENT MANAGEMENT, INC.,
et al.

Defendants.

Case No. 1:07-cv-10524-AKH

JERE C. WHITE, et al.,

Plaintiffs,

v.

PZENA INVESTMENT MANAGEMENT, INC.,
et al.

Defendants.

Case No. 1:08-cv-00406-AKH

NOTICE OF MOTION

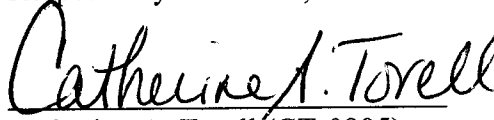
PLEASE TAKE NOTICE that upon the annexed Declarations of Catherine A. Torell and Avi Samuel Garbow and the Certificates of Good Standing annexed thereto, the undersigned will appear before the Honorable Alvin K. Hellerstein on a date to be determined by the Court, in the United States Courthouse, 500 Pearl Street, New York, New York 10007 for an Order (attached as Exhibit A), pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, admitting Avi Samuel Garbow as attorney *pro hac vice*.

FILED
U.S. DISTRICT COURT
SDNY
2008 APR -3 AM 11:20
C.D. OF N.Y.

2
4/3/08
5-25-08
9559

Dated: April 3, 2008

Respectfully submitted,

A handwritten signature in black ink that reads "Catherine A. Torell". The signature is written in a cursive style with a large, looped "C" at the beginning.

Catherine A. Torell (CT-0905)

COHEN, MILSTEIN, HAUSFELD & TOLL, PLLC

150 East 52nd Street

New York, New York 10022

Telephone: (212) 838-7797

Facsimile: (212) 838-7745

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ESTHER LOWINGER, et al.)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:07-cv-10524-AKH
)	
PZENA INVESTMENT MANAGEMENT, INC.,)	
et al.)	
)	
Defendants.)	
JERE C. WHITE, et al.,)	
)	
Plaintiffs,)	
)	Case No. 1:08-cv-00406-AKH
v.)	
)	
PZENA INVESTMENT MANAGEMENT, INC.,)	
et al.)	
)	
Defendants.)	
)	

[PROPOSED] ORDER

This matter coming before the Court on the Motion to Appear Pro Hac Vice of Movant, Avi Samuel Garbow of Cohen, Milstein, Hausfeld & Toll, P.L.L.C., 1100 New York Avenue, NW, Suite 500 West, Washington, District of Columbia, 20005 for purposes of the above-entitled and numbered cause. After careful consideration, the Court is of the opinion that said motion should be GRANTED. It is therefore ORDERED that Avi Samuel Garbow shall be allowed to appear before this Court *pro hac vice*, subject to the Local Rules of the Southern District of New York.

Signed this _____ day of April, 2008

UNITED STATES DISTRICT COURT JUDGE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ESTHER LOWINGER, et al.)	
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Plaintiffs,)	
)	
v.)	Case No. 1:07-cv-10524-AKH
)	
PZENA INVESTMENT MANAGEMENT, INC.,)	
et al.)	
)	
Defendants.)	
)	
JERE C. WHITE, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:08-cv-00406-AKH
)	
PZENA INVESTMENT MANAGEMENT, INC.,)	
et al.)	
)	
Defendants.)	
)	

DECLARATION

Catherine A. Torell, hereby declares as follows:

1. I am an attorney admitted to practice in the State of New York, and in the Southern District of New York, and an attorney with the firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C. I submit this Declaration in support of the motion to admit Avi Samuel Garbow to the United District Court for the Southern District of New York *pro hac vice* for purposes of this action.

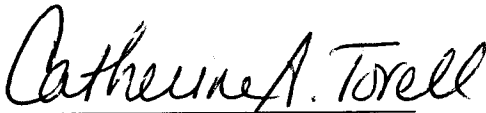
2. I agree to act as local counsel for Avi Samuel Garbow and to observe the Rules of this Court governing the conduct of attorneys.

3. Avi Samuel Garbow is a member in good standing of the Bar of the District of Columbia and the Bar of the State of Virginia. Mr. Garbow is a partner with the firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C., and is counsel to plaintiff, Chaoxu Zhao, in this action.

4. For the foregoing reasons, it is respectfully requested that Avi Samuel Garbow be admitted *pro hac vice* to the United States Court for the Southern District of New York for purposes of this action.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: April 3, 2008


Catherine A. Torell

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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)	
v.)	Case No. 1:07-cv-10524-AKH
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PZENA INVESTMENT MANAGEMENT, INC.,)	
et al.)	
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JERE C. WHITE, et al.,)	
)	
Plaintiffs,)	
)	Case No. 1:08-cv-00406-AKH
v.)	
)	
PZENA INVESTMENT MANAGEMENT, INC.,)	
et al.)	
)	
Defendants.)	
)	

DECLARATION


Avi S. Garbow, hereby declares as follows:

1. I am a partner with the law firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C.
2. I submit this Declaration in support of the motion of Catherine A. Torell for my admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificates of Good Standing annexed hereto, I am a member in good standing of the Bar of the District of Columbia, admitted in 2004, Bar No. 445399, and the Bar of Virginia, admitted in 1992, Bar No. 34990.
4. There are no pending disciplinary proceedings against me in any State or Federal Court.

5. Wherefore, declarant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in the above-captioned case.

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: April 1, 2008



Avi Samuel Garbow

**United States District Court
for the District of Columbia
CLERK'S OFFICE
333 Constitution Avenue, NW
Washington, DC 20001**

I, **NANCY M. MAYER-WHITTINGTON**, Clerk of the United States
District Court for the District of Columbia, do hereby certify that:

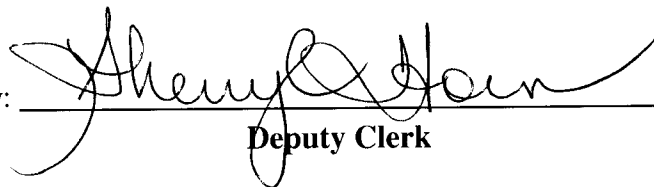
AVI SAMUEL GARBOW

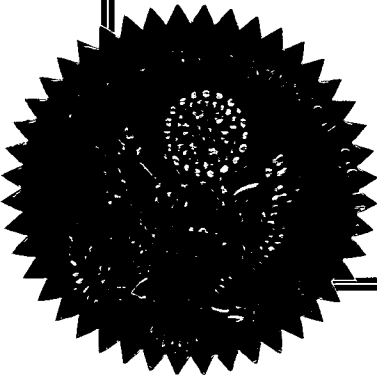
was, on the 2nd day of February A.D. 2004 admitted to practice as an Attorney
at Law at the Bar of this Court, and is, according to the records of this Court, a
member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of said Court
in the City of Washington this 20th day of March A.D. 2008.

NANCY M. MAYER-WHITTINGTON, CLERK

By: _____


Deputy Clerk



UNITED STATES DISTRICT COURT

Eastern

DISTRICT OF

Virginia

**CERTIFICATE OF
GOOD STANDING**

I, Fernando Galindo, *Clerk of this Court,*

certify that Avi Samuel Garbow, *Bar #* 34990,

was duly admitted to practice in this Court on

9/6/2002, *and is in good standing*
DATE

as a member of the Bar of this Court.

Dated at Alexandria, VA *on* 3/20/2008.
LOCATION DATE

Fernando Galindo
CLERK OF COURT



DEPUTY CLERK

UNITED STATES DISTRICT COURT
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et al.

Defendants.

Case No. 1:08-cv-00406-AKH

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of April, 2008, I caused to be served a true and correct copy of the foregoing Notice of Motion to admit Counsel Pro Hac Vice, Declarations of Catherine A. Torell and Avi Samuel Garbow in support of Motion to Admit Counsel Pro Hac Vice and [Proposed] Order Granting Application of Avi Samuel Garbow for Admission Pro Hac Vice upon counsel listed on the attached service list, via U.S. Mail, postage prepaid:


Catherine A. Torell

SERVICE LIST

Jeffrey Simon Abraham
Abraham Fruchter & Twersky LLP
One Penn Plaza
Suite 1910
New York, NY 10119

Brian Howard Polovoy
Sherman & Sterling LLP
599 Lexington Avenue
New York, NY 10022